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Attorney for Debtor Satian Phongpitag

IN THE UNITED STATES BANKRUPTCY COURT
IN AND FOR THE EASTERN DISTRICT OF CALIFORNIA
SACRAMENTO DIVISION

In re:

SATIAN PHONGPITAG,

Debtor.

Case No. 09-22258
DC No: RDG-1

Chapter 7

**NOTICE OF MOTION
TO AVOID LIEN**

Date: January 27, 2014
Time: 10:00 A.M.
Place: Courtroom 28
U.S. Bankruptcy Court
501 "I" Street, 7th Floor
Sacramento, CA 95814
Judge: Hon. Michael S. McManus

NOTICE IS NOW GIVEN that Debtor SATIAN PHONGPITAG by and through his attorney-of-record RYAN D. GRIFFIN of THE GRIFFIN LAW FIRM will move this court for an order canceling and avoiding a judicial lien on the Debtor's real property.

The Debtor will seek to avoid the lien of Creditor NATIONAL CREDIT ACCEPTANCE in accordance with 11 U.S.C. 522(f). The Debtor believes, based on information and belief that any interest in this judicial lien was assigned to SACOR FINANCIAL, INC. and notice is provided to this alleged lien-holder as well.

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1 This motion has been set for hearing on January 27, 2014, at 10:00 A.M. in Courtroom 28
2 of the Eastern District United States Bankruptcy Court, located at 501 "I" Street, 7th Floor,
3 Sacramento, CA 95814.

4 No party-in-interest is required to file written opposition to a motion when fewer than 28
5 days' notice of a hearing is provided. Opposition may be presented at the hearing. Should
6 opposition be presented at the hearing, the Court may continue the hearing to permit the filing of
7 evidence and briefs. (Local Rule 9014-1(f)(2)(C))
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9 DATED: January 4, 2014

Submitted Respectfully,

11 /s/ Ryan D. Griffin
12 RYAN D. GRIFFIN
13 Attorney for Debtor
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